



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

TWO POTOMAC YARDS
2733 SOUTH CRYSTAL DRIVE
ARLINGTON, VA 22202

DATE: January 9, 2015

PREPARED BY: [REDACTED]

CASE #: OI-AR-2011-ADM-1228

CROSS REFERENCE #: Hotline 2010-0477,
Hotline 2010-336, Hotline 2010-358, Hotline 2010-468.

TITLE: OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

CASE CLOSING REPORT

Subject(s)	Location	Other Data
Unknown	Washington, DC	

VIOLATION(S)

5 C.F.R. Part 2635: Standards of ethical conduct for employees of the executive branch

ALLEGATION: On or about October 7, 2010, complainant, [REDACTED] made a complaint via the OIG Hotline #2010-477, alleging a conflict of interest between EPA, Office of Chemical Safety and Pollution Prevention (OCSPP) and big business, namely [REDACTED]. Complainant [REDACTED] also alleged [REDACTED] used [REDACTED] studies, toxicity reports, inhalation data, chemistry data, etc., without [REDACTED] permission, and without compensating [REDACTED]. Finally, Complainant [REDACTED] alleged [REDACTED] falsified documentation to obtain registration for their [REDACTED] product, and that former EPA, OCSPP employee [REDACTED] may have assisted [REDACTED] with obtaining [REDACTED] data.

FINDINGS: On March 14, 2012, Special Agent (SA) [REDACTED], of the United States Environmental Protection Agency (EPA), Office of the Inspector General (OIG), Office of Investigations, interviewed [REDACTED] and learned that [REDACTED] was approved by the EPA, OPP, on approximately [REDACTED] and hit the markets shortly thereafter. [REDACTED] product # [REDACTED] was approved by the EPA, OPP on approximately [REDACTED] and hit the markets shortly thereafter. According to [REDACTED] [REDACTED] struggled from [REDACTED] to [REDACTED] to get their chemical data and studies approved by the EPA, and it was only after [REDACTED] product

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██████ was approved and available for market, that ██████ obtained and used ██████ data, and then was able to get their product approved. ██████ went even further to suggest that ██████ changed the name of their product from ██████, all while using ██████ data without ██████ permission and compensation. According to ██████ in ██████ 2001, ██████ filed a Freedom of Information Act (FOIA) request with the EPA, and this was when ██████ learned that ██████ copied and used ██████ data and studies. Upon learning this information via FOIA, ██████ said ██████ did not ask ██████ for compensation. According to ██████ ██████ filed a civil suit against ██████ in approximately 2001 or 2002. However the case never went to court because according to ██████ ██████ could not afford the court costs and retainer fees.

After ██████ failed attempt to bring ██████ to civil court, ██████ started contacting ██████, personnel from EPA, OCSPP, OPP, and initiated EPA, OIG Hotline complaints. In 2010, ██████ filed approximately four (4) EPA, OIG Hotline complaints (**Hotline 2010-0477, Hotline 2010-336, Hotline 2010-358, Hotline 2010-468**) see below, alleging that the EPA was allowing ██████ and other companies to register products without going through the proper registrant product procedures. ██████ also alleged that the EPA was allowing dangerous products to be sold on the market. These complaints did not fall under the purview of the OIG OI, and therefore were referred to the EPA Regional Enforcement Coordinator, EPA Criminal Investigations Division (CID), EPA Office of Enforcement and Compliance Assurance (OECA), EPA OCSPP, and EPA, OIG, Office of Program Evaluation (OPE).

OI Referrals Made:

- 1). On March 17, 2010, EPA, OIG, Office of Cyber Investigations and Homeland Security (OCI-HS), referred this complaint to EPA, Region 9, Regional Enforcement Coordinator – OIG Hotline #2010-336.
- 2). On April 1, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, CID– OIG Hotline #2010-358.
- 3). On April 13, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, OECA, and EPA OCSPP – OIG Hotline #2010-358.
- 4). On August 16, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, CID – OIG Hotline #2010-468.
- 5). On October 7, 2010, EPA, OIG, OCI-HS, referred this complaint to EPA, OIG OI, Headquarters – OIG Hotline #2010-477.
- 6). On December 23, 2010, EPA, OIG, OI, Northeastern Resource Center, referred this complaint to EPA, Region 4, CID.
- 7). On February 11, 2011, EPA, OIG OI, Headquarters, referred this complaint to EPA, OIG, OPE.

Interviews of EPA OCSPP, Office of Pesticide Programs (OPP) personnel were conducted during which OPP explained the following: ██████ are substantial similar products, meaning the active ingredients are relatively in the same portion, same chemical composition, and similar inert ingredients. In such circumstances there are approved mechanisms by which a similar product can seek expedited registration using another products data. OPP

further stated the checklist for the [REDACTED] registration package appears to be intact and complete. Lastly, OPP, explained when companies have a dispute with one another regarding the use of their data and compensation, it is up to the companies to resolve that issue, and not the EPA. Reviews of the documents obtained suggested that [REDACTED] took the necessary and correct measures to register [REDACTED] client's product with the EPA for consideration of approval.

DISPOSITION: Unfounded. Closed

This investigation was unable to substantiate any allegations of misconduct involving EPA personnel. Additionally, all appropriate referrals have been made, therefore this investigation is closed in this office.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

DATE: December 3, 2015

PREPARED BY: [REDACTED]

CASE #: OI-AR-2014-ADM-0038

CROSS REFERENCE #:

TITLE: [REDACTED] GS-14, [REDACTED], Office of Civil Rights

CASE CLOSING REPORT

Subject(s)	Location	Other Data
[REDACTED]	[REDACTED]	N/A

ALLEGATION: This investigation was initiated on January 30, 2014, based on information that [REDACTED] GS-14, [REDACTED], EPA Office of Civil Rights, [REDACTED] incurred \$54,191.84 in AT&T international roaming charges on [REDACTED] EPA-issued mobile device with a service number of [REDACTED]. The charges were incurred during the period February through June 2011 and were paid by the EPA.

FINDINGS: During January 2014, information was received from [REDACTED] Information Management Group/Mobile Devices Business Office, Research Triangle Park (RTP), North Carolina. The information included call detail report and billing dispute resolution data pertinent to [REDACTED] EPA-issued devices. The information indicated [REDACTED] was issued a mobile device with a phone number listed as [REDACTED] prior to receiving the device with a phone number listed as [REDACTED]. According to a report listed in eBusiness, EPA employee [REDACTED] reported the device ending in the numbers [REDACTED] as damaged and excessed in 2009. [REDACTED] also listed the device ending in the numbers [REDACTED] as lost and requested the registration be cancelled. Both entries were made on June 17, 2011. Reviews of phone records in November 2014 and an interview of [REDACTED] on December 2, 2014, revealed the device issued to [REDACTED] ending in the numbers [REDACTED] was used exclusively to make and receive calls from the country of Benin from February through June 2011. [REDACTED] confirmed the charges totaling \$54,191.84 were paid by the EPA. [REDACTED] indicated the proper reporting procedures were not promptly reported in order to prevent the extensive roaming charges from being billed to the EPA. [REDACTED] noted the call history was restricted to calls from and to Benin, to the exclusion of any local calls. [REDACTED] said this not a typical pattern of abuse by an EPA user and concluded the calls were consistent with a stolen device. During January and September 2015, reviews of EPA e-mails originating from accounts assigned to [REDACTED] and [REDACTED] did not reveal any data regarding a connection between [REDACTED] and the country of Benin, however, one e-mail contained a full accounting from [REDACTED] to EPA management regarding the details of how the device ending in the numbers [REDACTED] was lost/stolen during late August 2009. On October 27, 2015, retired EPA employee [REDACTED] was interviewed. [REDACTED] indicated [REDACTED] was serving in the capacity of [REDACTED] at EPA in [REDACTED] when [REDACTED] made the eBusiness entries described above on June [REDACTED] 2011. [REDACTED]

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advised [REDACTED] completed the necessary reporting after the excessive international roaming charges were discovered pertinent to the device ending in the numbers [REDACTED]. After conferring with [REDACTED] regarding the device ending in the numbers [REDACTED] and the damage incurred on that device, [REDACTED] made that entry on the same date to ensure the reporting procedures were completed on that device as well. [REDACTED] was confident that [REDACTED] followed the proper reporting procedures to the letter. [REDACTED] strongly believed [REDACTED] predecessor in the role of [REDACTED], now retired EPA employee [REDACTED], failed to report the device ending in the numbers [REDACTED] as lost/stolen during 2009 immediately after [REDACTED] communicated the situation with [REDACTED]. [REDACTED] concluded this inaction resulted in the EPA ultimately paying for fraudulent calls placed by those in possession of the device. On November 23, 2015, [REDACTED] was interviewed. [REDACTED] asserted [REDACTED] had no connection of any kind with Benin, and had never heard of Benin prior the interview. [REDACTED] stated [REDACTED] did not call Benin nor did [REDACTED] accept any calls from Benin using any EPA-issued mobile device. Regarding [REDACTED] assigned device ending in the numbers [REDACTED], [REDACTED] related the device was lost/stolen in late August/early September 2009 while [REDACTED] was at a gym called [REDACTED] in [REDACTED]. [REDACTED] indicated [REDACTED] informed EPA management of the loss immediately upon [REDACTED] return to duty. [REDACTED] stated [REDACTED] received a replacement device from [REDACTED] whose responsibility it was to make the appropriate notifications to cancel registration of the lost/stolen device. [REDACTED] said [REDACTED] only became aware of excessive charges on the device during 2011 after EPA made [REDACTED] aware of them. [REDACTED] stated [REDACTED] was surprised to hear of the charges at that time since [REDACTED] believed the device had been turned off after [REDACTED] disclosure of the loss in 2009. During the interview, [REDACTED] expressed disappointment that [REDACTED] previously-assigned mobile device was fraudulently used at the agency's expense. [REDACTED] asserted [REDACTED] did the right thing regarding this matter and expressed strong doubt that [REDACTED] made the necessary notifications necessary to cancel or inactive the device before the agency incurred the associated costs. [REDACTED] noted [REDACTED] made the notifications during June 2011 after conferring with [REDACTED] about the circumstances surrounding the loss of the device.

DISPOSITION: The allegation that [REDACTED] incurred international roaming charges on [REDACTED] EPA-issued mobile device is disproven. Further information gathered from [REDACTED] and [REDACTED] indicated that the agency has instituted more controls designed to thwart fraud on EPA-issued mobile devices. Therefore this case is closed.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 Hawthorne Street, 7th Floor
San Francisco, CA 94105

DATE: October 9, 2015

PREPARED BY: [REDACTED]

CASE #: OI-SA-2011-CFR-2861

CROSS REFERENCE #:

TITLE: LEAD REMEDIATION ASSOCIATION OF AMERICA (LRAA)

CASE CLOSING REPORT

Subject(s)	Location	Other Data
Lead Remediation Association of America	137 Josiah Avenue San Francisco, CA 94112	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	

VIOLATIONS: 18 USC SEC 286 Conspiracy to defraud the government
18 USC SEC 641 Embezzlement and theft of public money

ALLEGATION: This investigation was initiated based on a referral from the EPA's Office of Grants and Debarment (OGD). The referral described problems located during a desk review of EPA grantee Lead Remediation Associates of America (LRAA). These included a lack of internal controls, missing progress reports, project results not being achieved, and a lack of adequate documentation. Additionally multiple suspect expenditures and purchases appeared to have been made with EPA grant funds.

FINDINGS: On September 5, 2007, EPA awarded grant number AB83363501 to the LRAA in the amount of \$249,988 to support the San Francisco Bay Area Lead Safe Work Practices Initiative. The scope of the grant included providing training workshops for contractors, property owners, and day laborers; producing and distributing 3,750 DVDs covering lead safety FAQs and informational updates; and distributing various educational brochures and fact sheets.

This office could not substantiate whether or not individuals were being trained in accordance with the grant due to the lack of documentation by LRAA. Also, some of the work performed by LRAA was not considered an acceptable deliverable by EPA standards. However, LRAA did

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completed some of the tasks on the grant, albeit not to the standards EPA had hoped for. EPA did not make these standards clear in the grant agreement.

Through a review of bank records, the investigation revealed EPA grant funds were used for personal use, such as meals and entertainment. Most, if not all, of the funds used for personal use were reimbursed.

DISPOSITION: This investigation was presented to the United States Attorney's Office (USAO) Northern District of California, Criminal Division. The USAO declined prosecution (b) (5)

A Civil Assistant United States Attorney, USAO, Northern District of California, was consulted. (b) (5) that the matter would not be accepted.

A referral was made to EPA OIG Forensic Audits. The results of the audit are pending.

This investigation was presented to EPA, Suspension and Debarment. After a discussion the investigation was declined citing (b) (5), (b) (6), (b) (7)(C)

No further investigative activity is warranted and it is recommended this investigation be closed.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF THE INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS
WESTERN RESOURCE CENTER
75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105**

REFERRED FOR ACTION REPORT OF INVESTIGATION CONCERNING

**LEAD REMEDIATION ASSOCIATION OF AMERICA (LRAA)
OI-SA-2011-CFR-2861**

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Distribution:


DIRECTOR OF FORENSIC AUDITS

Approvals:

Special Agent

Acting Special Agent in Charge

**OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS**

CASE NO.:	OI-SA-2011-CFR-2861	DATE OPENED:	09/26/2011
CASE TITLE:	LEAD REMEDIATION ASSOCIATION OF AMERICA (LRAA)	CASE AGENT:	<div style="background-color: black; width: 200px; height: 20px;"></div>
CASE CATEGORY:	PROGRAM INTEGRITY	OFFICE:	OFFICE OF INVESTIGATIONS - SAN FRANCISCO WESTERN RESOURCE CENTER
JOINT AGENCIES:	FEDERAL BUREAU OF INVESTIGATION		
JURISDICTION:	CALIFORNIA		

SECTION A - NARRATIVE

Predication

On September 15, 2011, the Environmental Protection Agency (EPA) Office of the Inspector General (OIG), Office of Investigation (OI), received a referral from the EPA's Office of Grants and Debarment (OGD). The OGD referral identified issues revealed during a desk review of EPA grantee Lead Remediation Associates of America (LRAA). These issues included a lack of internal controls, missing progress reports, project results not being achieved, and a lack of adequate documentation. Multiple suspect expenditures and purchases appear to have been made with EPA grant funds.

Possible violations:

1. TITLE 18 USC SEC 286, Conspiracy to defraud the government
2. TITLE 18 USC SEC 641, Embezzlement and theft of public money, property or records

Impact/Dollar Loss

LRAA was awarded a \$249,988 EPA grant.

Synopsis

This office could not substantiate whether or not individuals were being trained in accordance with the grant due to the lack of documentation by LRAA. Also, it appears that some of the work performed by LRAA may not be considered an acceptable deliverable by EPA standards. However, LRAA does appear to have completed some of the tasks on the grant, albeit not to the standards EPA had hoped for.

This office did determine that EPA grant funds were being used for personal use. Most, if not all, of the funds used for personal use were reimbursed.

Due to the repayment of the grants funds it was determined (b) (5) investigation was not accepted for prosecution. This office was advised that due to (b) (5) this investigation would also not be prosecuted on a civil level.

This investigation is being referred to the Office of Audit for any action that is deemed appropriate.

Details

Allegation 1: LRAA did not complete tasks on the grant and did not provide documentation to support task completion.

Allegation 1 Findings: On September 5, 2007, EPA awarded grant number AB83363501 to the LRAA in the amount of \$249,988 to support the San Francisco Bay Area Lead Safe Work Practices Initiative. The scope of the grant included providing training workshops for contractors, property owners, and day laborers; producing and distributing 3,750 DVDs covering lead safety FAQs and informational updates; and distributing various educational brochures and fact sheets. The project budget period was September 1, 2007 to June 30, 2011. EPA Grant and Interagency Agreements Management Division identified issues revealed during a desk review of LRAA. These issues included a lack of internal controls, missing progress reports, project results not being achieved, and a lack of adequate documentation. Multiple suspect expenditures and purchases appear to have been made with grant funds. (Exhibit 1)

On January 24, 2012, [REDACTED], was interviewed and stated one of [REDACTED] first projects at [REDACTED] was a series of instructional videos regarding the proper safety procedures with working with lead. [REDACTED] working on the videos shortly after [REDACTED] working at [REDACTED] in September 2011, and continuing to work on them through October 2011. [REDACTED] was tasked with putting the regulations into a format which would be educational and entertaining. [REDACTED] was aware that the videos were created pursuant to an EPA grant, but [REDACTED] was not sure what the terms of the grant were. [REDACTED] recalled that completing the videos was a high priority of [REDACTED] so they would not have to worry about the EPA grant any longer.

[REDACTED] reported that the only time [REDACTED] heard of the LRAA was during the process of creating the videos. [REDACTED] has not heard any references to the LRAA since. [REDACTED] reported that an individual named [REDACTED] helped with the creation of the videos. [REDACTED] was not an employee or a paid consultant of [REDACTED]. A former [REDACTED] employee named [REDACTED] also worked on the videos before [REDACTED] from [REDACTED] did most of the editing and production of the videos. Since the creation of the videos, [REDACTED] has not done any other video or media projects. [REDACTED]

has not seen any sort of commercial DVD burner, or any other method of mass producing the videos. [REDACTED] has not seen [REDACTED] since completion of the videos. (Exhibit 2)

On February 16, 2012, [REDACTED] was interviewed. [REDACTED] is [REDACTED] [REDACTED] stated [REDACTED] has known [REDACTED] for approximately [REDACTED] years. In August 2010, [REDACTED] Shortly thereafter, [REDACTED] asked [REDACTED] as [REDACTED]. The business primarily involved consulting work on a grant projects on the [REDACTED]. Around August 2011, [REDACTED] became very serious about completing the grant from the EPA. [REDACTED] described [REDACTED] as being obsessed with finishing the EPA project.

[REDACTED] had a media duplicator and a camera which [REDACTED] purchased from the EPA grant funds and was keeping the duplicator and camera in storage somewhere in San Francisco. [REDACTED] reportedly told [REDACTED] would be able to use the equipment for other purposes once the grant was done. However, [REDACTED] never saw any of the equipment used. [REDACTED] recalled [REDACTED] teaching a number of classes on lead remediation. [REDACTED] and [REDACTED] worked on the EPA grant and produced a series of videos, which [REDACTED] appeared in a couple of segments before [REDACTED] left [REDACTED]. [REDACTED] did not know if any physical videos were produced or if they were only published on the internet. (Exhibit 3)

On April 11, 2012, [REDACTED] was interviewed and reported [REDACTED] was the owner of a painting company based in San Francisco, California. [REDACTED] company, [REDACTED] specialized in dealing with lead abatement. [REDACTED] gained expertise by attending classes on lead abatement at [REDACTED] in San Francisco during the mid 1990s. [REDACTED] role under the EPA grant was to provide expertise on lead remediation to [REDACTED] about the lead remediation process. [REDACTED] handled all the administration of the grant and the interactions with the EPA. [REDACTED] and [REDACTED] would occasionally conduct classes in lead abatement. Typically the classes would be given to day laborers. According to [REDACTED] [REDACTED] was in charge of documenting the classes. [REDACTED] also helped with the creation of a series of instructional videos for lead remediation. [REDACTED] stated the DVD burner [REDACTED] purchased was in [REDACTED] office. [REDACTED] was waiting for EPA to sign off on his videos before [REDACTED] started burning additional instructional tapes. (Exhibit 4)

On May 22, 2012, [REDACTED] was interviewed and stated [REDACTED] is the [REDACTED], and has been since [REDACTED]. In [REDACTED] capacity as [REDACTED], [REDACTED] was awarded a grant from EPA to teach safe lead handling techniques. [REDACTED] wrote a proposal to the San Francisco Board of Supervisors regarding the issue. The Board was interested, and had provided funding to an organization called [REDACTED] in an earlier grant. [REDACTED] followed up with a proposal to EPA in June of 2007. In 2007, EPA policy allowed for training of day laborers in spite of potentially funding the training of undocumented workers.

In 2008, the federal regulations regarding working with lead changed and any instructional materials [REDACTED] produced at the time would have been obsolete. [REDACTED] was hoping for additional grants from the EPA and/or state entities, but no additional money came through. As a result, [REDACTED] wanted to wait to produce the videos once the regulations were clear in order to avoid having to reshoot. [REDACTED] did maintain a list of people who attended the classes, but some did not want to sign because they were day laborers who were not always documented. [REDACTED] filmed most of the videos in June 2011, but it is still an ongoing process. (Exhibit 5)

On September 14, 2012, an email was sent to [REDACTED] by [REDACTED] Project Officer, EPA. In the email [REDACTED] requested that the DVD's be sent to him for a thorough review. [REDACTED] noted that videos posted on YouTube.com had inconsistent sound levels and were of poor quality. As a result, Lead Renovation Program Specialists within EPA need to review DVDs. [REDACTED] also requested "documentation, information and examples of the materials developed and provided to participants for the community outreach and training portion of the grant." Other documents were also requested such as community outreach contact information, copies of outreach letters, and curriculums of various conferences and workshops. (Exhibit 6)

On September 25, 2012, grant documents were reviewed. It was noted that only four General Ledgers were submitted listing expenditures and income on the grant. They are dated 07/16/2008-08/14/2008, 09/16/2008-10/15/2008, 10/16/2008-11/17/2008, and 12/13/2008-01/15/2009. A review of these ledgers revealed that on 20 occasions, cash withdrawals were made for stipends for day laborer students, amounting to 376 students reportedly receiving stipends. Also, nine lists which contained names of individuals who reportedly attended the classes conducted by LRAA were reviewed. The dates of the classes were listed as July 11, 2008; August 15, 2008; September 2, 2008; September 11, 2008; and September 24, 2008. One of the lists is undated, however the layout is similar to that of the September 24, 2008 list and contains approximately seven of the same names as that list contains. None of the lists provided identifying information for the attendees and the locations of the trainings was not identified. (Exhibit 7)

Allegation 2: EPA grant funds were used for personal use.

Allegation 2 Findings: During the May 22, 2012, interview of [REDACTED] acknowledged [REDACTED] wrote checks to [REDACTED] self on occasion and stated that it was because [REDACTED] had to get money out in order to pay expenses relating to the contract. [REDACTED] advised [REDACTED] wrote a check for the camera equipment to [REDACTED] self because the camera company would not accept a large check. This resulted in [REDACTED] having to use cash for the transaction. [REDACTED] stated [REDACTED] would occasionally write checks to cash in order to pay bills for the LRAA. [REDACTED] previously ran into issues where the EPA would not send the grant money to [REDACTED] quickly enough to back up the checks, and they would occasionally bounce. (Exhibit 5)

The September 25, 2012, review of grant documents revealed four occasions where the transaction detail is "Misc. personal expense to be reimbursed" and two occasions where the transaction detail is "Deposit to reimburse..." Other transaction details included "bank fees," "gas for meetings", and "miscellaneous." (Exhibit 7)

A standard form 424B, Assurance-Non-Construction Programs, was located amongst the grant documents reviewed. It is signed by [REDACTED] and item number 3 states: "Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain."

Other investigative techniques were used during the course of this investigation. It is anticipated that an audit of LRAA's records will reveal the same information discovered during the use of the aforementioned investigative techniques.

Disposition

This investigation was presented to the United States Attorney's Office (USAO) Northern District of California, Criminal Division. The USAO declined prosecution (b) (5).

A Civil Assistant United States Attorney, USAO, Northern District of California, was consulted. (b) (5), it was advised that the matter would not be accepted.

This office discussed this investigation with Attorney (b) (5), EPA Office of Grants and Debarment, (b) (5). Memorandums from this investigation were provided to (b) (5) who is currently working to prepare (b) (5) recommendation.

This investigation is being referred to the Office of Audits for any action that is deemed appropriate.

SECTION B – ENTITIES AND INDIVIDUALS

Title & Company: LEAD REMEDIATION ASSOCIATION OF AMERICA,

Role: Subject

Business Address: 137 Josiah Avenue, San Francisco, CA, 94112

Business Phone:

EPA Employee: N

Name of Person: (b) (5)

Title & Company: Lead Remediation Association of America

Role: Subject

Business Address: (b) (5),

Business Phone: (b) (5)

EPA Employee: N

SECTION C – PROSECUTIVE STATUS

ADMIN/CRIMINAL/CIVIL ACTION(S): LEAD REMEDIATION ASSOCIATION OF AMERICA, On August 10, 2012, Assistant United States Attorney (AUSA) David Callaway, Northern District of California, declined prosecution in (b) (5)

Attorney (b) (5) is working on (b) (5) recommendation for LRAA.

ADMIN/CRIMINAL/CIVIL ACTION(S): (b) (5)

On August 10, 2012, AUSA Callaway declined prosecution in this matter (b) (5)

Attorney (b) (5) is working on (b) (5) recommendation for (b) (5)

EXHIBITS

DESCRIPTION	EXHIBIT
CI-09/26/2011	1
MOI-1/24/2012-[REDACTED]	2
MOI-02/16/2012-[REDACTED]	3
MOI-04/11/2012-[REDACTED]	4
MOI-05/22/2012-[REDACTED]	5
Other Document-09/14/2012-Email to [REDACTED] from EPA	6
MOA-09/25/2012-Grant docs reviewed	7